

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

April 21, 2009

TO: Internal File

THRU: Priscilla Burton, Lead

FROM: April A. Abate, Environmental Scientist II *AA* 4-21-2009

SUBJECT: Permit Modification for Construction of Additional Fuel Storage Containments, Canyon Fuel Company LLC, Skyline Mine, Permit # 007/0005, Task #3258

SUMMARY:

Canyon Fuel Company LLC submitted a request to construct additional containment to their existing fuel storage containment structures. Skyline mine plans to construct new reinforced concrete pads and a lean-to roof covering the pads over the existing fuel storage containment area located adjacent to the southwest corner of the employee parking lot. The second fuel containment area is located at the woodshed structure. A reinforced concrete pad will be constructed underneath the already covered woodshed structure. The new structures are necessary in order to conform to new regulations set forth by the Environmental Protection Agency (EPA) Spill Prevention Countermeasure and Control (SPCC) Plans as defined in 40 CFR 112 for secondary containment required during fuel off-loading. The fuel storage containment area and the wood shed are both located within the permit boundaries of the Skyline mine.

The amendment meets the requirements of the State of Utah R645-Coal Mining Rules and should therefore be approved.

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TECHNICAL ANALYSIS:

OPERATION PLAN

SUPPORT FACILITIES AND UTILITY INSTALLATIONS

Regulatory Reference: 30 CFR Sec. 784.30, 817.180, 817.181; R645-301-526.220

Analysis:

The Permittee met the requirements of this section. The Permittee provided the Division with updated information regarding cross-sections illustrating the containment and roof designs on Plates 3.2.5-2a and 3.2.5-2b. The footprint of each of the planned structures have been modified and included on Plate 3.2.1-1 Surface Facilities Map. In accordance with 526.220, the application states on page 3-32 of the MRP that these support facilities upgrades are necessary in order to comply with the EPA regulations outlined in their updated SPCC plan to prevent/minimize water pollution by including secondary containment for off-loading fuel practices.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

RECOMMENDATIONS:

The Division should approve the amendment to approve the additional fuel containment structures.